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WAD 2917
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5/8/1989

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Ecology Northwest Regional Office

MEMORANDUM

May 8, 1989

To: Julie Sellick, John Conroy

From: Barbara Smith

Subject: Hazardous Waste Compliance Inspection at Chemical Processors Pier 91 facility (WAD 000812917) on March 14, 1989

On March 14, 1989 I conducted a hazardous waste compliance inspection at Chemical Processors (Chempro) Pier 91 facility in Seattle. The purpose of the inspection was to determine the facility's compliance with the Washington State Dangerous Waste Regulation, Chapter 173-303 WAC. Accompanying me on the inspection from the Department of Ecology were Dave Lundstrom of the Northwest Regional Office and Dave Polivka of the Hazardous Waste Permits Section in Olympia. Also accompanying me on the inspection was Mr. Jack Boller of the Washington Operations Office of the Environmental Protection Agency. The purpose of Mr. Boller's inspection was to determine Chempro Pier 91's compliance with the land disposal restrictions ("land ban").

Chempro representatives present during the inspection were Nate Mathews, Pier 91 Plant Manager, Peter Ressler, Chempro Compliance Manager, Ron Atwood, Chempro Director of Operations, and Trudi Harding.

Pre-inspection Meeting

We arrived at the facility at 9:30 am and meet in Mr. Mathews office. Mr. Ressler requested that reprints of any photographs taken during the inspection be mailed to him.

Mr. Mathews explained the history and basic operation of the facility to us. From this discussion I learned the following:

> The Chempro facility at Pier 91 was built during the 1920's and operated by Texaco. During World War II the military took over the operation and continued to occupy the site until approximately 1970. The site was then turned over to the Port of Seattle and the Port has leased it to Chempro since then.
>
> Pier 91 is mainly a waste oil reclamation facility. Waste oil is treated in tanks to separate impurities and break emulsion. The processed oil is sold to Pacific Northern Oil as cutting stock for marine boiler fuel. The facility also receives bilge and ballast waters, and industrial oily waste waters for processing. Pier 91 also accepts liquid wastes containing low levels of contaminants, such as phenols and heavy metals, for treatment. The maximum capacity at the Chempro Pier 91 facility is 3.5 million gallons.

Chempro Pier 91 has notified as a generator, accepting wastes from off-site, a treatment facility, a storage facility, and a marketer of hazardous waste fuel. No reactive or ignitable wastes are handled at the facility. Wastewater is batch treated and discharged to the sanitary sewer under a Metro Industrial waste discharge permit (Metro Permit No. 7099-RO9/84-2). Each batch of treated wastewater is tested prior to discharge for compliance with the Metro permit limits.

Documentation Review

I began the inspection with a review of the updates to the various plans for the facility. The most recent updates to the plans are as follows.

Waste Analysis Plan	September 26, 1986
Closure Plan	September 18, 1987
Closure cost update	March 1988
Contingency Plan	September 19, 1988
Personnel Training	Undated

Mr. Ressler agreed to forward copies of the closure plan and the 1988 closure cost estimates, contingency plan, and personnel training plan to me.

I checked the August 1988 manifests for the incoming wastes. Most transportation is done by Resource Recovery, however several other transporters also deliver waste oil to Pier 91 such as Frank's Waste Oil, United Drain Oil, and Amalgamated Services.

Mr. Boller selected two months of outgoing manifests and reviewed them for compliance with the Land Disposal Restrictions. I also reviewed the same two months of outgoing manifests for compliance with the manifesting requirements.

I also reviewed the documentation for deliveries of oil to Pacific Northern Oil Company.

I reviewed the training records and as an example chose a Mr. Hector Gambosa's, a long term employee at the facility.

I then asked Mr. Mathews questions relating to the generator and TSD requirements applicable to the facility (refer to attached checklists for Generator, General TSD Facilities, and Interim Status TSD Facilities).

The entire Pier 91 complex is fenced and patrolled by security personnel 24 hours per day. Chempro is one of several businesses operated inside the patrolled area. Access to the Pier 91 complex is via a gate staffed by security personnel 24 hours per day. Chempro's facility is fenced and signs are posted every 25 feet stating "Danger Unauthorized Personnel Keep Out" (refer to photograph 15).

As specified in the waste analysis plan, all shipments of wastes arriving at the facility are tested before they are unloaded from the truck to verify the information provided prior to shipment.

All waste oil received at Pier 91 is handled as though it were off-specification.

I asked about an inspection plan for the facility. Mr. Ressler said the company had an inspection checklist, but not an inspection plan. Mr. Ressler said the company would prepare a facility inspection plan and send a copy to me in about one week.

Site Inspection

We began the site inspection with the off-loading area along the west side of the facility (refer to photographs 1 and 2). Near the off-load area is the laboratory. Samples of all incoming material are taken and analyzed before the truck is unloaded.

We walked to the east side of the facility, through the "bone yard" (laydown area) and climbed the stairs to the catwalks above the tanks. From the walks we could see the treatment tanks (refer to photographs 3 and 4) and the storage tanks (refer to photograph 5).

Next we walked back onto the bone yard. In the area was a shed marked with oxidizer hazard labels. I asked Mr. Mathews about the shed and he said the hydrogen peroxide stored in the shed is used in the treatment of phenol contaminated waste.

We then entered the building (identified as 19 on the plot plan). Inside the building was the waste storage area. In the storage area were drums of drilling mud from the recent soil and groundwater investigation work done at the Pier 91 facility (refer to photograph 8). The drums were labeled as non-regulated waste" (refer to photograph 13). Also stored in the area were two drums of pit sludge from the oil water separator in the off-loading area (refer to photographs 9 and 10) and one drum containing trace methanol from the drilling operation at the site (refer to photographs 11 and 12). The methanol was used to decontaminate the drilling equipment during the investigation.

We then walked to a separate building where the pumps for the fire suppression system are housed (refer to photograph 14). Mr. Mathews said the fire suppression system is checked once per week.

We then returned to the building and walked through a second lab. Mr. Mathews explained that the second lab is used for more elaborate testing and the first lab we visited (near the off-load area) is used for routine analysis.

Post Inspection Meeting

We met in Mr. Mathews office to review the results of the inspection. I said I had not seen any violations of the regulations during the site inspection and that I would review the updated contingency, closure, and waste analysis plans and the new inspection plan once I received them from Mr. Ressler. I explained that unless there was a problem with the plans, there would not be any outstanding compliance issues as a result of the inspection. Mr. Boller said he had not found any violations of the Land Disposal Restrictions. We then concluded the inspection and left the site at 11:50 am.

Post Inspection Review of Documents

Copies requested during the inspection were received at the Northwest Regional Office on March 22, 1989. Plans received were as follows:

Waste Analysis Plan	September 26, 1986
Closure Plan	September 18, 1987
Closure cost update	March 1988
Contingency Plan	September 19, 1988
Personnel Training	Undated
Inspection Plan	Undated

In the Closure Plan, a $52,951 credit appears in the closure cost estimate for the sale of 9,698 barrels of oil at $5.46/BBL (pages 13 and 14). Under WAC 173-303-400(3c)(v), and by reference -620(3)(iii), the owner/operator may not include salvage value in the closure cost estimate from any assets associated with the facility at the time of partial or final closure.

Attachments

cc: Jack Boller, EPA WOO
Dave Polivka, Ecology Olympia

Chemical Processors - Pier 91
May 8, 1989

Compliance Issues

1. WAC 173-303-400(3c)(v), and by reference -620(3)(iii) - The owner operator may not include salvage value in the closure cost estimate from any assets associated with the facility at the time of partial or final closure. Chempro Pier 91 lists a credit ($52,951) in the closure plan dated September 18, 1987 for the sale of oil recovered during closure procedures. This credit might also be included in the March 1988 update to the closure cost estimate.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4350-150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 867-7000

June 28, 1989

CERTIFIED MAIL

Mr. Nate Mathews
Chemical Processors, Inc.
Park 90/5, Suite 400
2203 Airport Way South
Seattle, Washington 98134

Dear Mr. Mathews:

Thank you for your assistance during the hazardous waste compliance inspection at Pier 91 on March 14, 1989. As we discussed at the end of the inspection, there were no outstanding compliance issues resulting from the inspection.

I did have one question about the Closure Plan dated September 18, 1987. On pages 13 and 14 a $52,951 credit appears for the sale of 9,698 barrels of oil at $5.46/BBL. Under WAC 173-303-400(3c(v), and by reference -620(3)(iii), the owner/operator may not include salvage value in the closure cost estimate from any assets associated with the facility at the time of partial or final closure. Is a credit for the sale of oil included in the March 1988 update to the closure cost estimate? Please check on this and let me know what you find by July 14, 1989.

Thanks again for your help during the inspection.

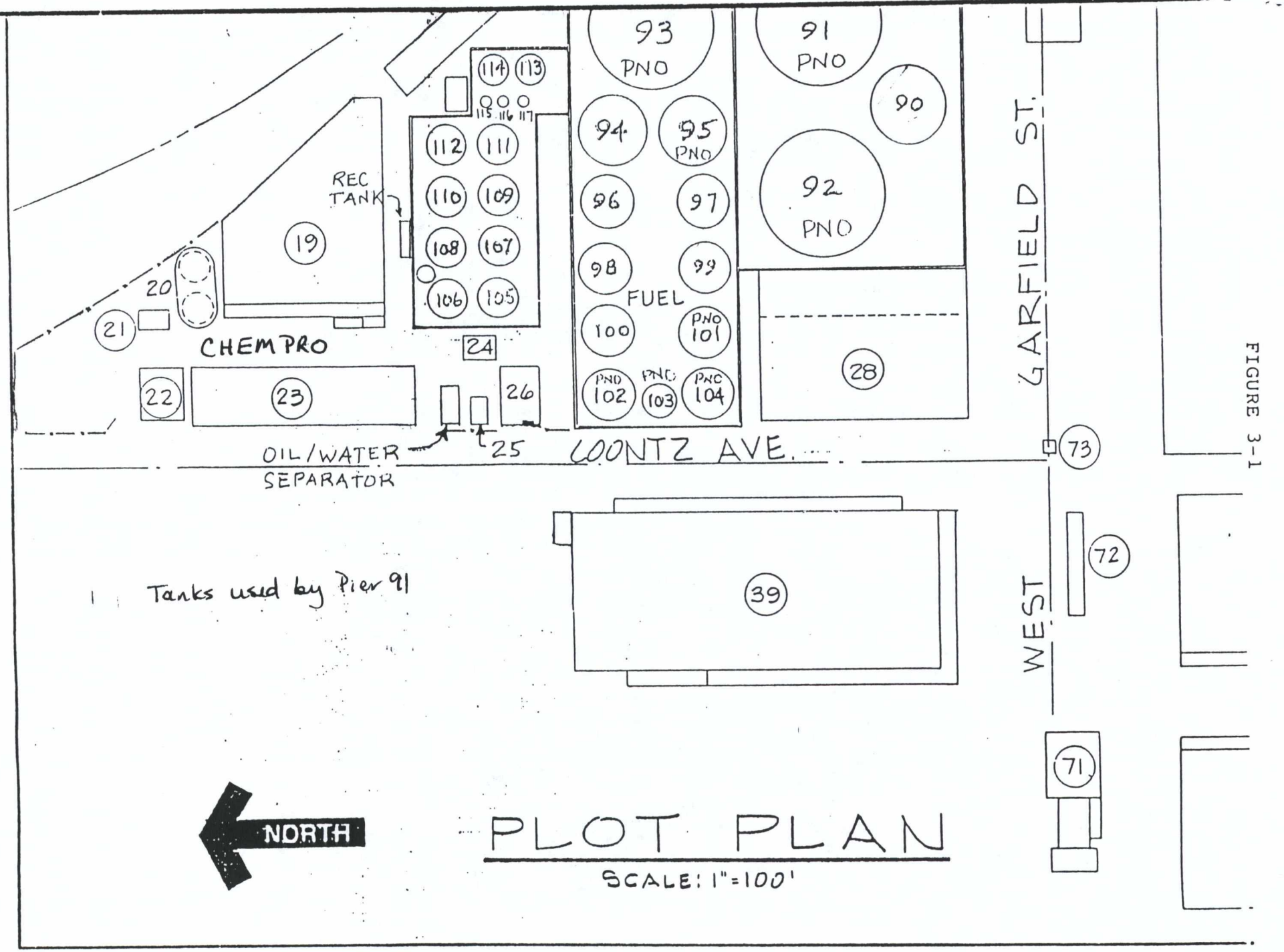
Sincerely,

Barbara Smith

Barbara Smith
Hazardous Waste Inspector

cc: Dave Polivka, Ecology Olympia
Julie Sellick, Ecology Redmond
Jack Boller, EPA WOO

CHEMPRO PIER 91



Tanks used by Pier 91

PLOT PLAN

SCALE: 1" = 100'

FIGURE 3-1

PHOTO No. 1

DATE: 3-14-89

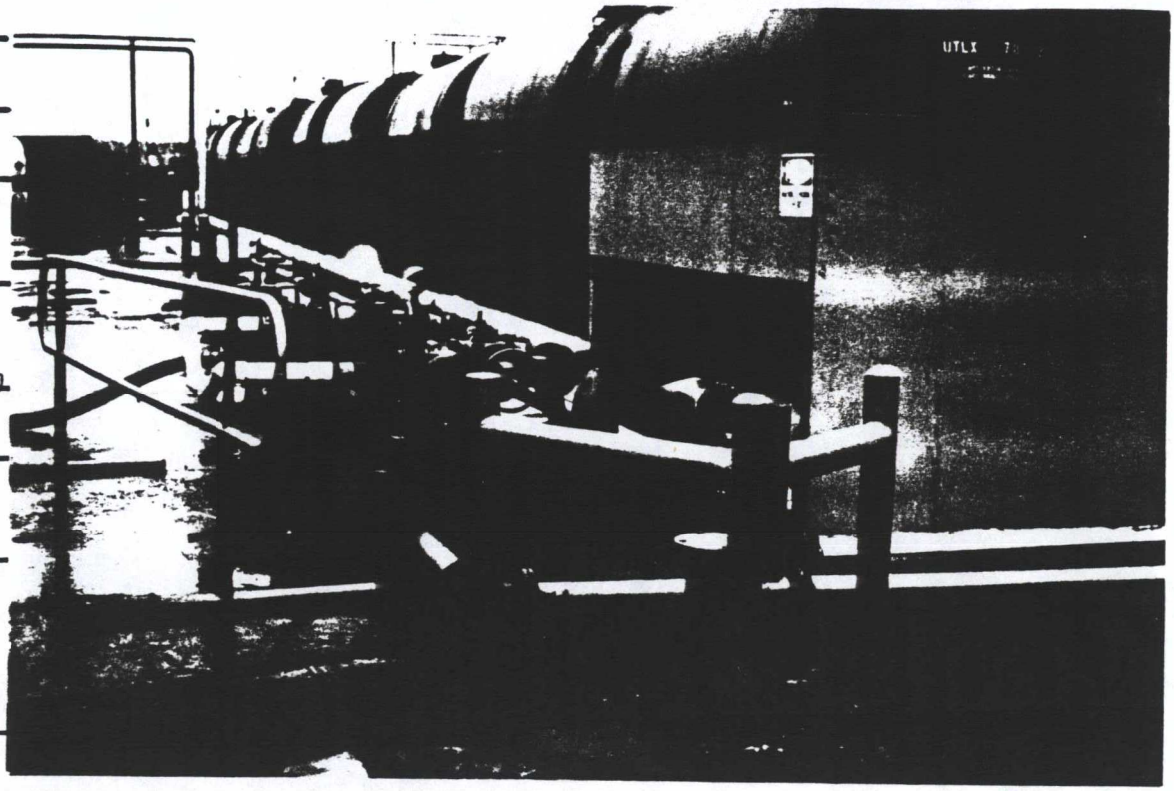
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: Off load area - view north of oil off load area

COMMENTS:

PHOTO No. 2

DATE: 3-14-89

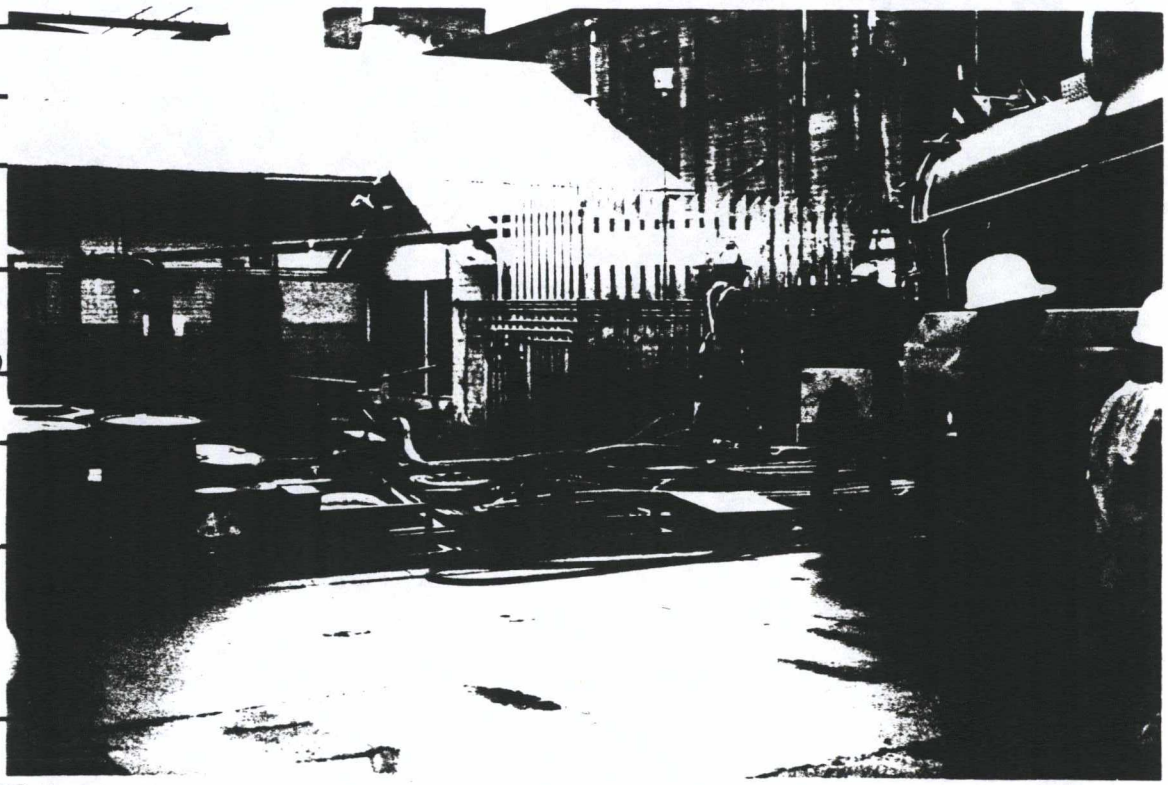
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: Off-load area - view south of non-oil off-load area. Oil/water separator is underneath steel grating.

COMMENTS:

PHOTO No. 3

DATE: 3-14-89

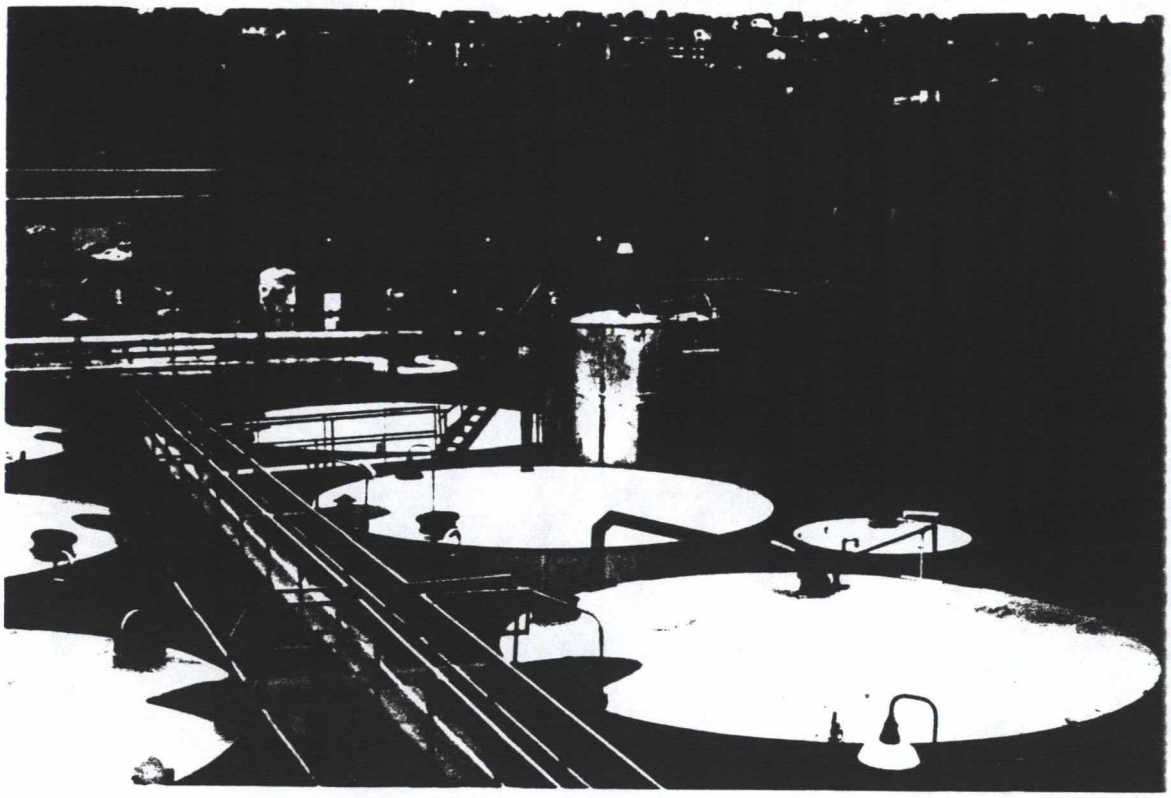
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: Tanks used for waste treatment. Taller tank (center right) is used to treat

COMMENTS: plural contaminated wastes.

PHOTO No. 4

DATE: 3-14-89

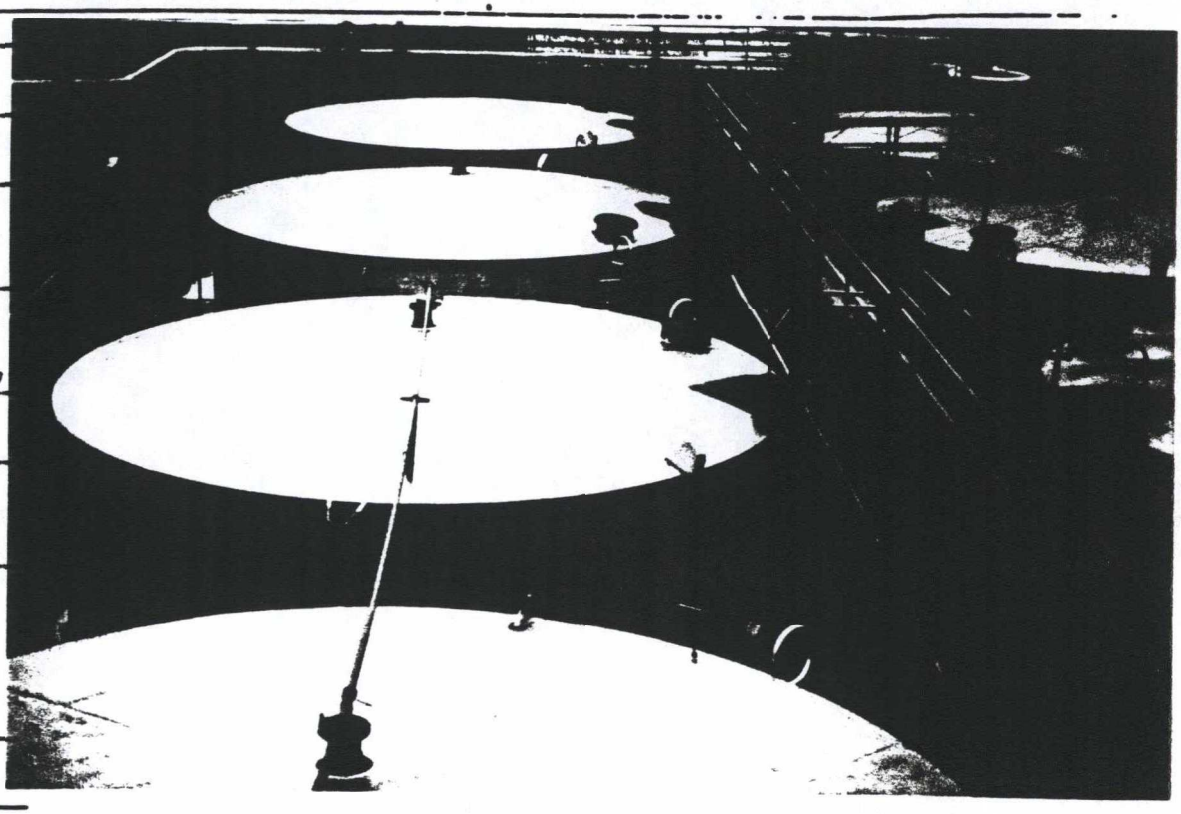
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: Tanks used for treatment of wastes.

COMMENTS:

PHOTO No. 5

DATE: 3-14-89

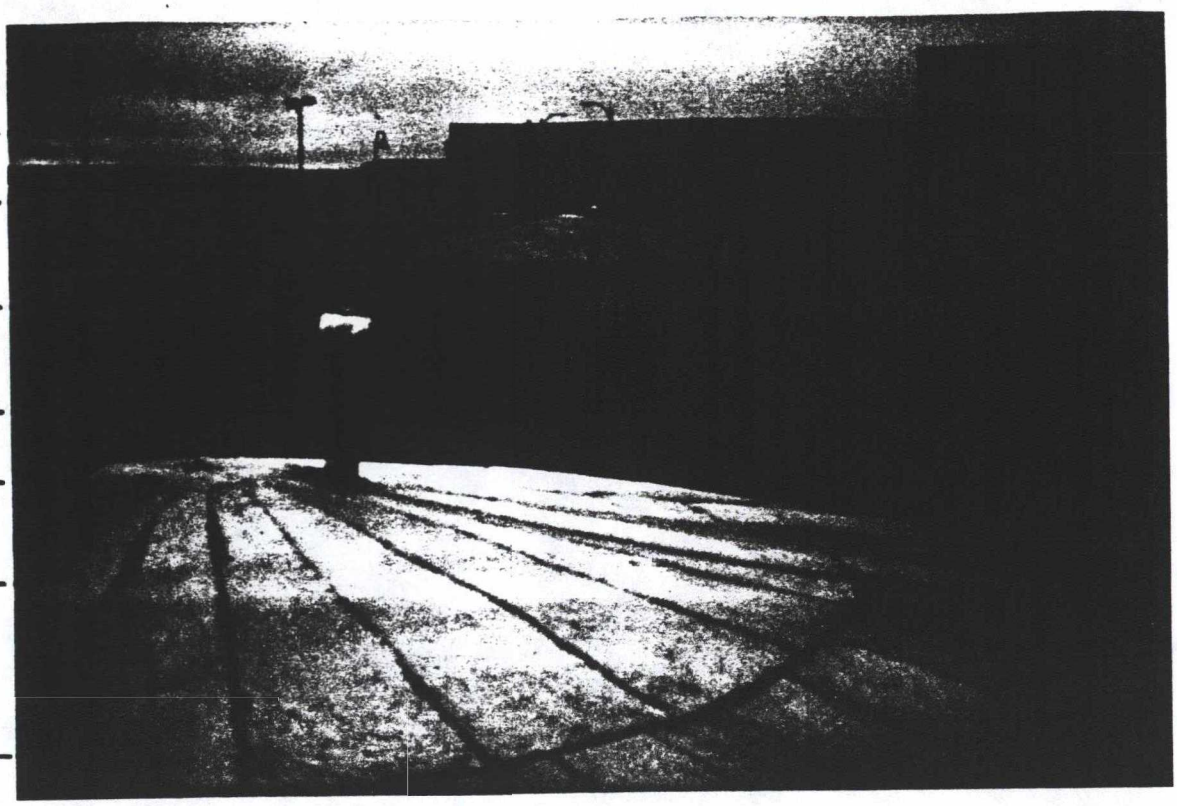
TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: View of storage tanks in MDO (Marine Diesel Oil) yard used by ChemPac and

COMMENTS: Pacific Northern Oil Company (PANOCO)

PHOTO No. 6

DATE: 3-14-89

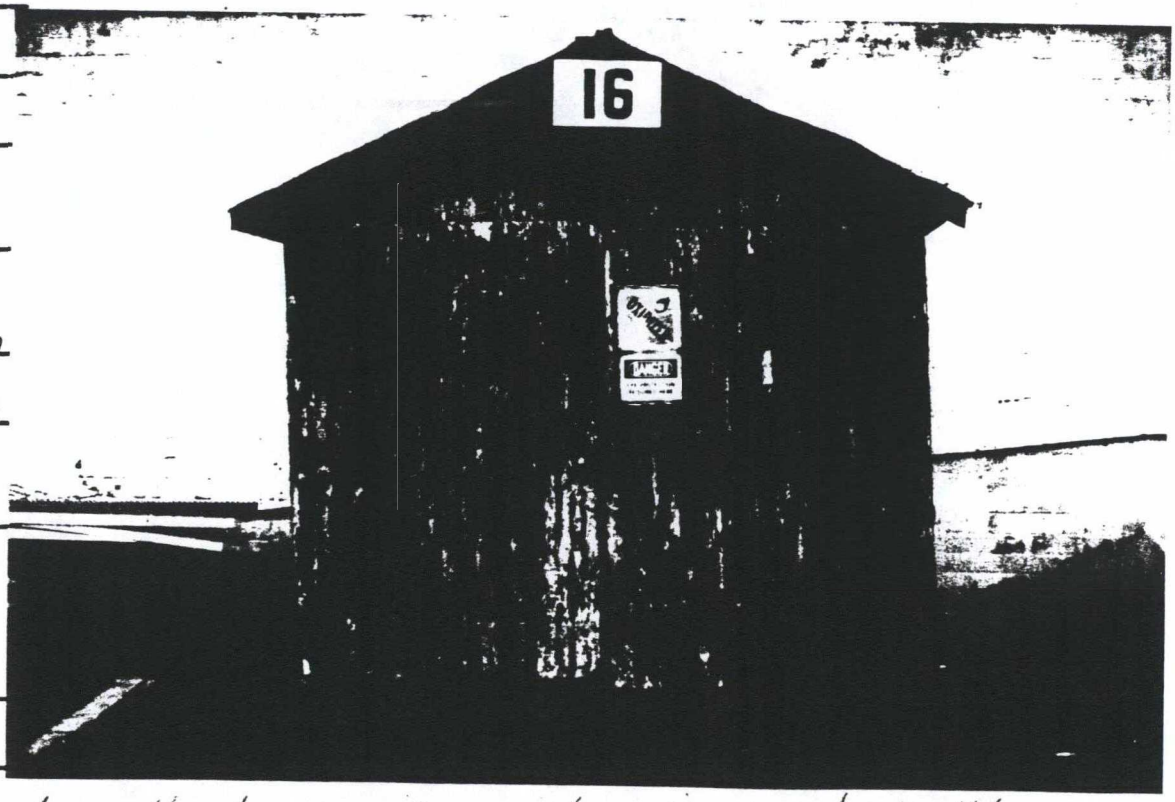
TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION: Hydrogen peroxide storage shed. Hydrogen peroxide is used in the

COMMENTS: treatment of diesel contaminated wastes.

PHOTO No. 7

DATE: 3-14-89

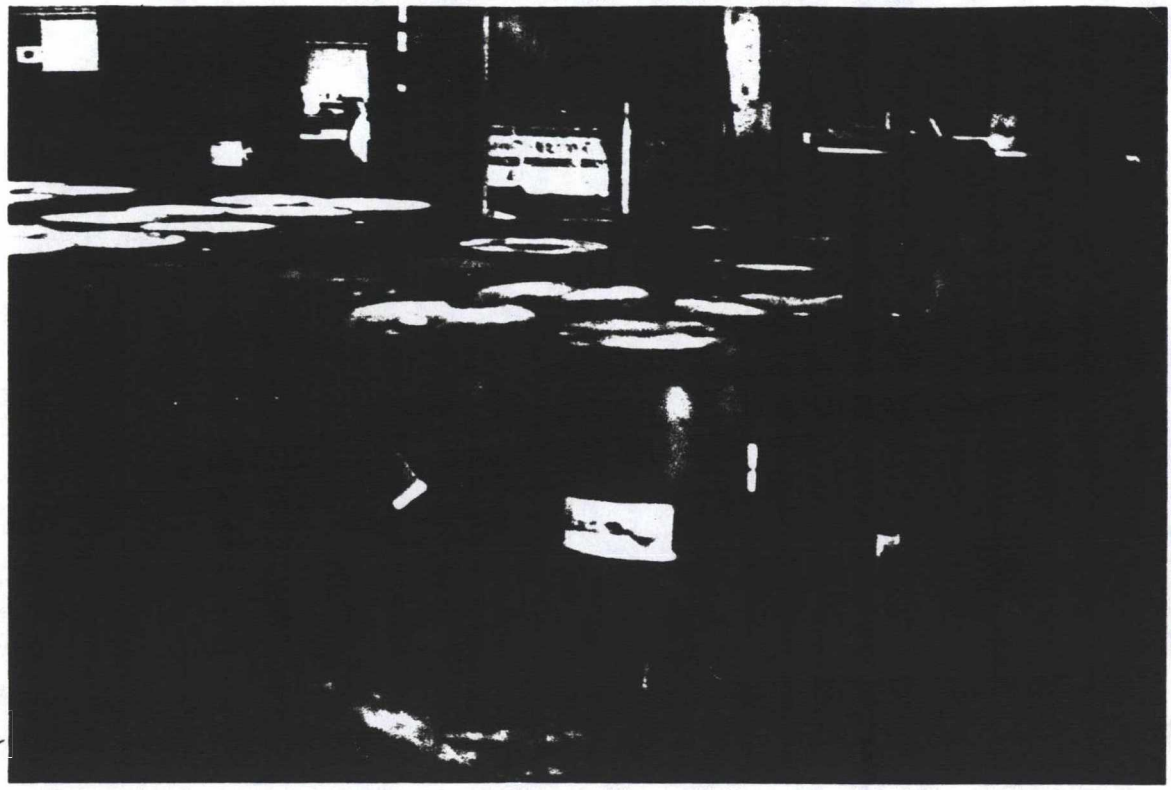
TIME: _____

TAKEN BY: Barbara Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION:

Waste storage area. Blue poly drums and orange top drums were empty

COMMENTS:

PHOTO No. 8

DATE: 3-14-89

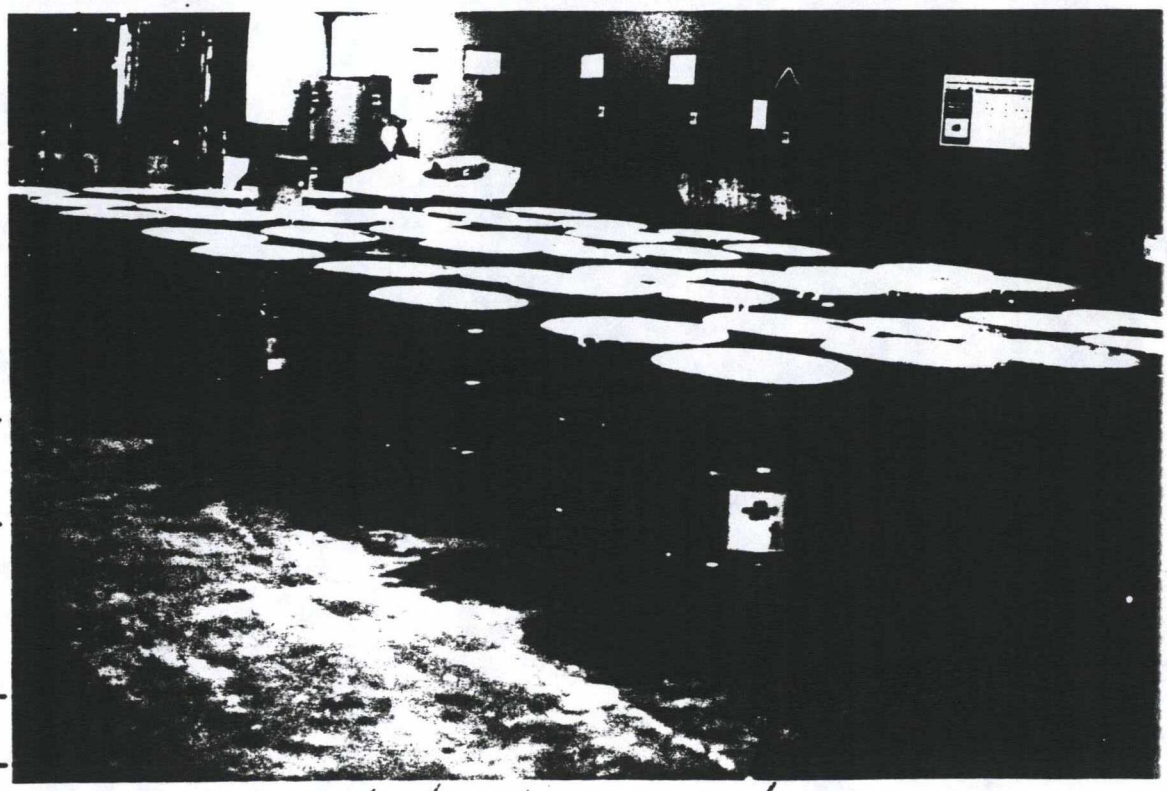
TIME: _____

TAKEN BY: Barb. Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION:

Waste storage area. White top drums were full of drilling mud from [illegible] investigations (See photo #13 also)

PHOTO No. 9

DATE: 3-14-89

TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1

DESCRIPTION:

Waste storage area - The two drums at center and center left contained sludge from the oil/water separator.

~~COMMENTS~~:

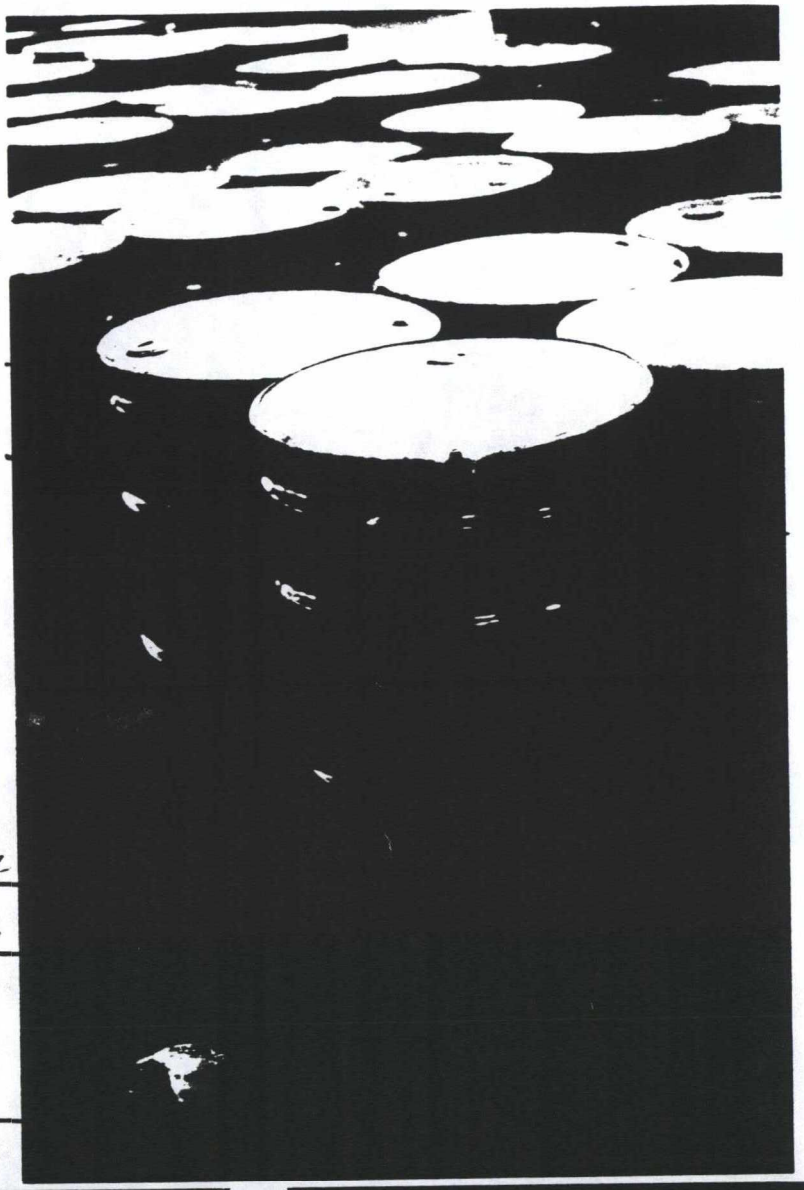


PHOTO No. 10

DATE: 3-14-89

TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1

DESCRIPTION:

Close up view of label on one of the drums of sludge from the oil/water separator.

~~COMMENTS~~:

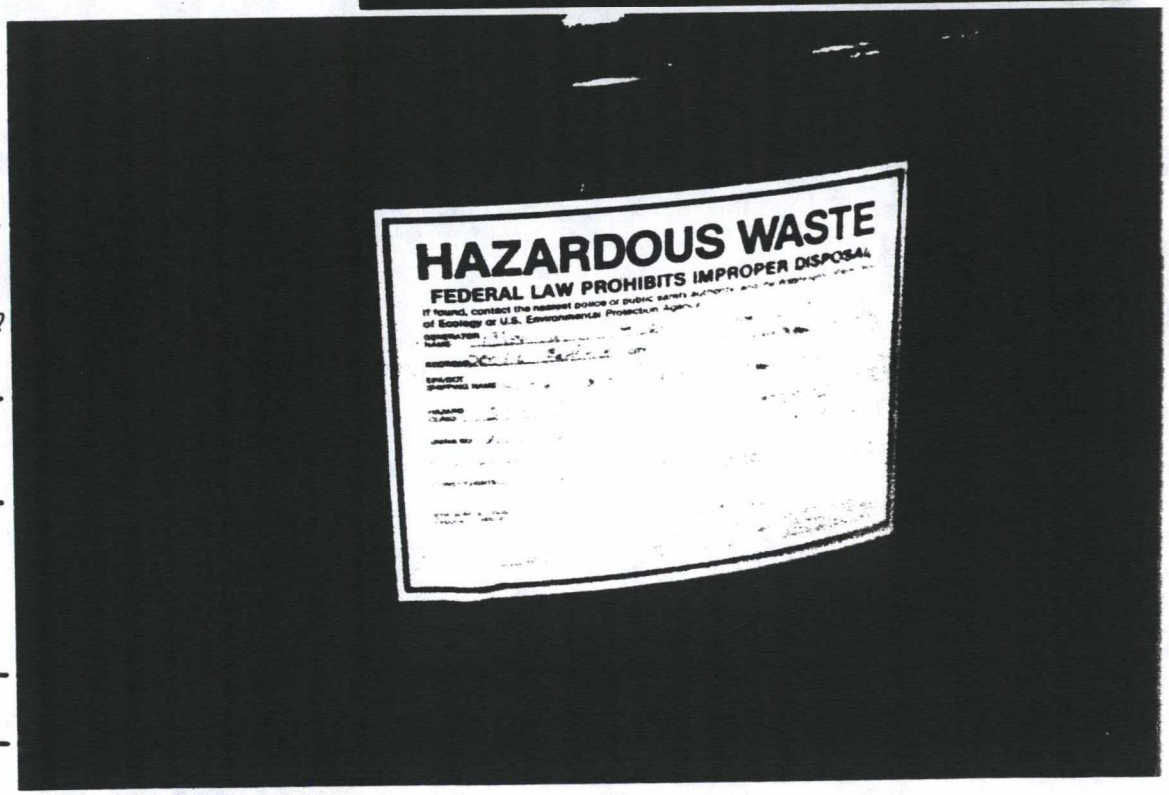


PHOTO No. 11

DATE: 3-14-89

TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1

DESCRIPTION:

View of the drum containing decontamination water/trace methanol from the cleaning of drilling equipment during on-site investigation

~~COMMENTS~~:

PHOTO No. 12

DATE: 3-14-89

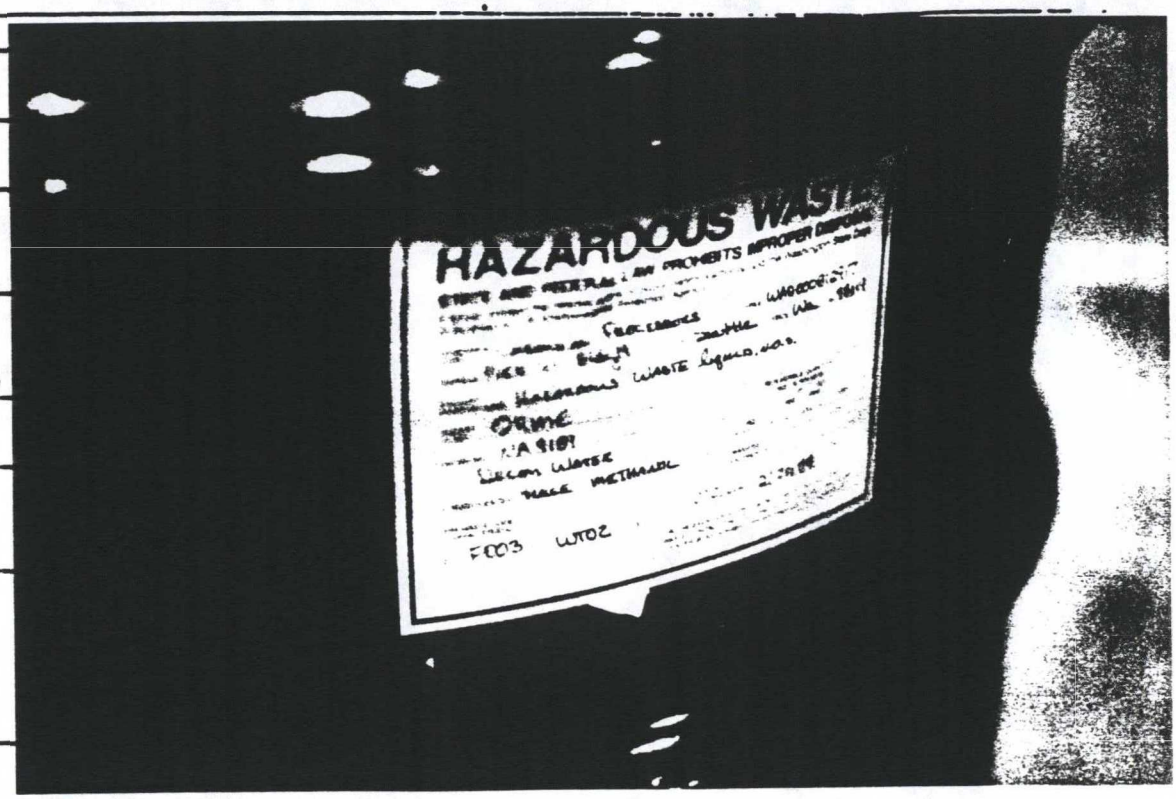
TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION:

Close up of label on "decon water/trace methanol" drum.

PHOTO No. 13

DATE: 3-14-89

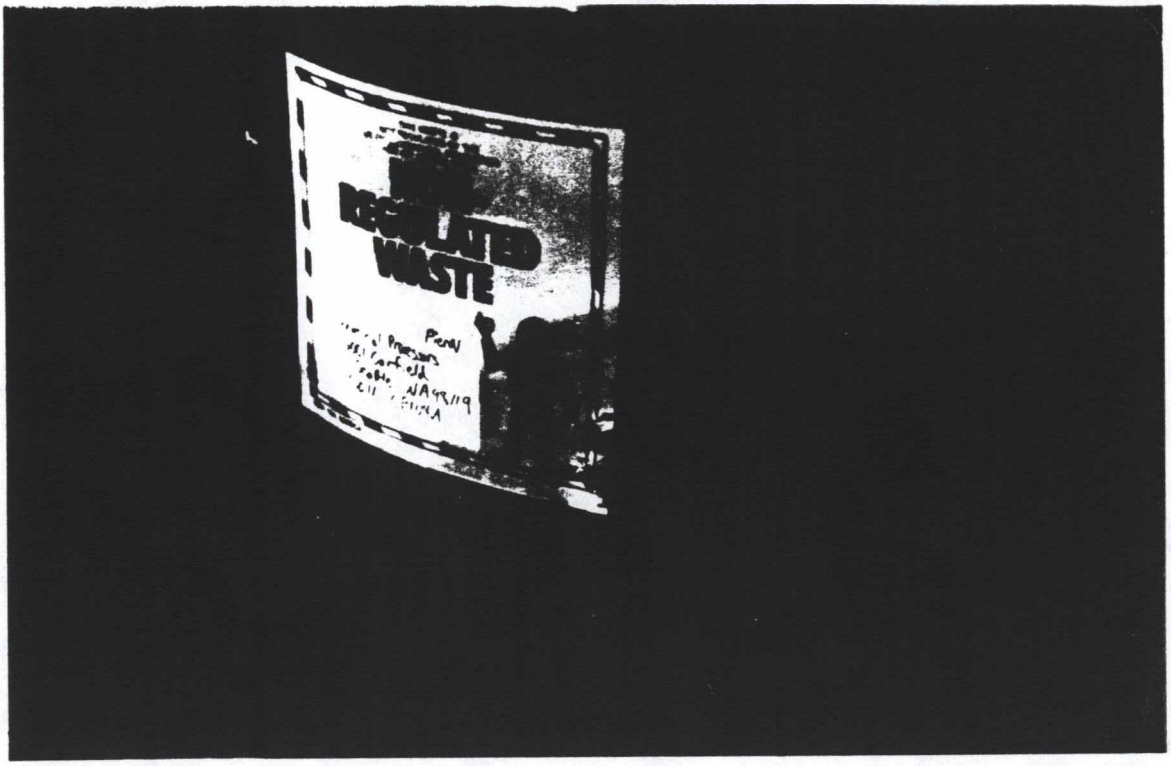
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION:

Close up of a label on a drum of drilling mud.

COMMENTS:

PHOTO No. 14

DATE: 3-14-89

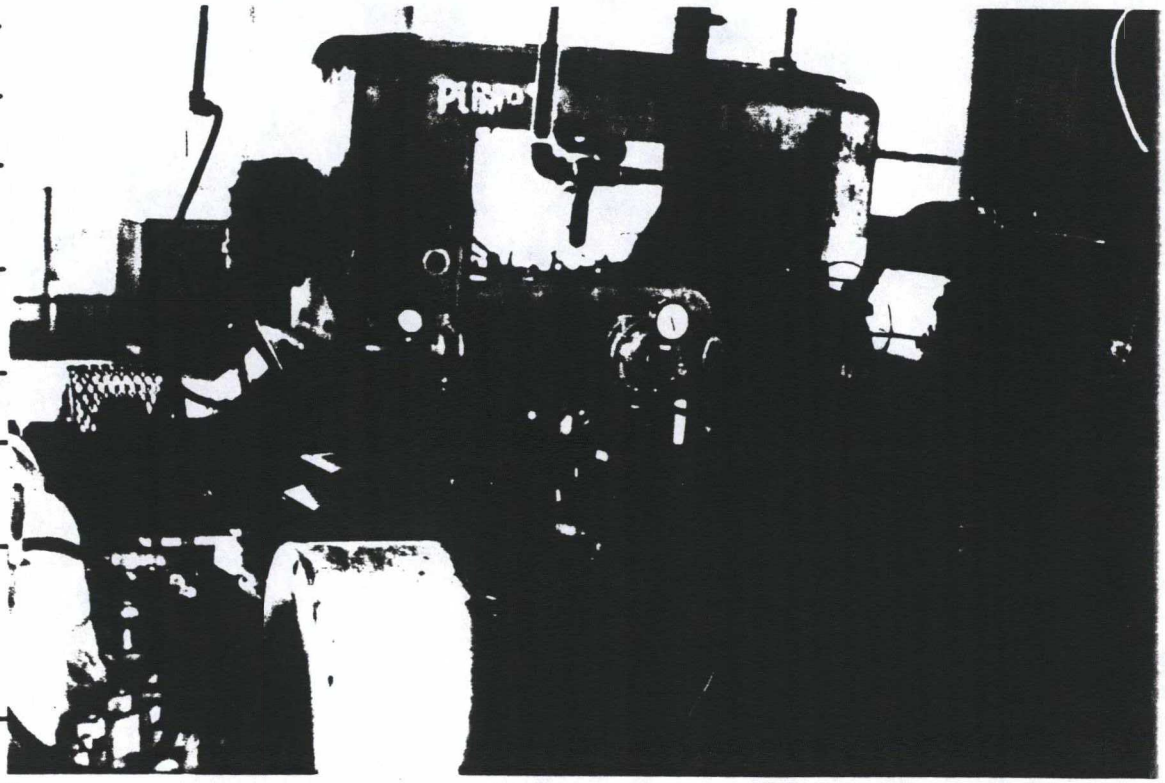
TIME:

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1



DESCRIPTION:

View of pumps for fire suppression system.

COMMENTS:

PHOTO No. 15

DATE: 3-14-89

TIME: _____

TAKEN BY: Barb Smith

WITNESS: Dave Lundstrom

FILM: Kodak 400

CAMERA: Canon AE1

DESCRIPTION:

View of signing on perimeter fences

COMMENTS: _____

PHOTO No. _____

DATE: _____

TIME: _____

TAKEN BY: _____

WITNESS: _____

FILM: _____

CAMERA: _____

DESCRIPTION:

_____

_____

_____

COMMENTS: _____

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC
March 1987

****

PART I: COVER INFORMATION

This part of the checklist/questionnaire is applicable to all persons who handle dangerous waste. This cover information includes a review of the Notification Form and confirmation of other general information necessary to maintain accurate files and records.

****

I. INSPECTOR INFORMATION

WDOE Inspector: Barbara Smith
: _____
Phone: 867-7019
: _____
Office (circle one): (NW) SW C E IND
Date of THIS Inspection: March 14, 1989
Date of LAST Inspection: _____
Other Inspectors Present:
Name: Jack Beller Agency: EPA Phone #: 753-9428
: Dave Lundstrom : Ecology : 867-7217
Dave Poliwka Ecology 438-7413

INSPECTION TYPE

Generator X
Transporter _____
Treatment X
Storage X
Disposal _____
Recycler _____
RCRA X
State-only X

2. BUSINESS INFORMATION

Business Name: Chemical Processors EPA/State ID #: WAD 000812917
Address: Pier 91
5001 Airport Way S
Seattle, WA 98108
Zip Code: 98108 County: King
Business Location (If: Pier 91, 2nd W. Garfield
Other Than Address) Seattle, WA 98119
Contact Person: Peter Ressler Phone #: 223-0500
: Nate Mathews : 284-2450

Business Representative Present During Inspection:

Name: Peter Ressler Title: Compliance Manager Phone #: 223-0500

: Nate Matthews : Plant Manager : 284-2450

: Ron Atwood : Dir. of Operations : 223-0500

Trudi Harding 223-0500

3. NOTIFICATION FORM REVIEW

Notification Form Filed: Yes X No ____ Date: Aug 25, 1986

Notification Form Revisions: Yes ____ No ____ Date: ____

Date: ____

Date: ____

Is the information provided in the most recent Notification Form still accurate? (If not, note any deficiencies in Comments, below.) Yes ____ No ____

Comments: ____

4. ADDITIONAL INSPECTION INFORMATION

Time Inspector Entered Site: 9:30 AM

Left Site: 11:50 AM

Were photographs taken during the inspection? Yes X

If yes, how many? 15 No ____

(Note: A brief description of the pictures should be prepared and included in the inspection report.)

Were many problems encountered regarding:

Permission to enter the site: No

Permission to have access to any areas on the site: No

Permission to have access to any records: No

Other: ____

Were samples taken during the inspection? Yes ____
No X

If yes, where and of what were samples taken:

_____

_____

_____

_____

Were samples split with the owner/operator? Yes ____
No ____

Were chain of custody procedures followed? Yes ____
No ____

Inspection: March 14, 1989
Chemical Processors, Pier 91, Seattle, Wa.

Land Disposal Restrictions
(Part 268)

Checklist Prepared by:
Jack Boller EPA R10/WOO

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listing)			
F001 thru F005 solvents?	X		
F020-23 and F026-28 Dioxins?		X	
"California List" H.W.?		X	
Exceptions:			
Can the prohibited wastes continue to be land disposed because: 268.1(c)-			
(1) A case-by case extension has been granted under Subpart C or 268.5?		X	
(2) A no-migration petition has been granted under 268.6?		X	
(3) The waste is contaminated soils or debris resulting from a CERCLA 104 or 106 response action or a RCRA corrective action (until 11/8/88)?		X	
(4) The waste is from conditionally-exempt small quantity generators?		X	
(5) A farmer is disposing of waste pesticides in accordance with 262.70? or:			
The waste is not subject to effective CA list prohibitions? 268.32 and:		X	
The waste has been certified as meeting treatment standards? 268.40(a) or:		X	
An exemption has been granted because the waste is certified treated by the best developed available technology (BDAT)? 268.44(a)		X	

* Land disposal means placement in or on the land, including a landfill, surface impoundment waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or placement in a concrete vault or bunker for disposal. 268.2(a)

	Yes	No	Comments
If F001-5 solvent wastes are being land disposed after 11/8/86 (except in an injection well), are they: 268.30(a)-			Wastes are not land disposed
(1) From a 100-1000 kg/mo. generator?		N/A	
(2) Generated from a CERCLA response action or corrective action under RCRA?			
(3) The initial generators waste is a solvent-water mixture, solvent-containing sludge or solid, or non-CERCLA or RCRA corrective action solvent-contaminated soil containing less than 1% total F001-5 solvent constituents (Table CCWE of 268.41)?			
(4) The solvent waste is a residue from treating a waste listed in (a)(1-3) above?			
or: The solvent waste is a treatment residue not described above where the residue belongs in a different treatability group than the initial waste, and contains less than 1% total F001-5 solvent constituents (Table CCWE of 268.41)?			
Are the F001-5 wastes being land disposed after 11/8/86 exempt from the prohibitions because: 268.30(c)-			
(1) The wastes meet the standards of Subpart D?			
(2) The wastes are disposed of at a facility that has been granted a no-migration exemption?			
(3) The wastes are disposed of at a facility that has been granted a case-by-case exemption?			
Has the facility not merely diluted the restricted waste to achieve compliance? 268.3			

	Yes	No	Comments
Storage:			
Are restricted wastes only being stored where: 268.50-			Restricted wastes are not stored for more than 90 days
(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	___	___	N/A
(a)(2) A TSD is accumulating a batch as above? and:			
(i) Each container is marked with the contents and accumulation start date?	___	___	
(ii) Each tank is marked with the contents, accumulation start date, quantity of H.W., and/or the information is in the operating record?	___	___	
(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:	___	___	
(d) The wastes are subject to an approved no-migration petition, case-by-case extension, or a nation-wide variance?	___	___	
(e) The wastes meet treatment or BDAT standards, or CA list specific prohibitions? or:	___	___	
(f) Liquid hazardous wastes over 50 ppm PCBs are stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?	___	___	

	Yes	No	Comments
If restricted wastes are generated on-site, has the generator: 268.7-			
(a) Using knowledge or analysis, determined if the waste is restricted from land disposal?	X	—	
(1) If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment facility with each shipment of waste, and included:			
(i) EPA H.W. number?	X	—	
(ii) Appropriate treatment standard and prohibitions?	X	—	
(iii) Manifest # for the waste?	X	—	
(iv) Available waste analysis data?	X	—	
If determined that the waste is restricted based solely on knowledge, is supporting data used in the determination maintained in the operating record? 268.7(a)(4)	N/A	all waste is tested	
If the waste is determined to be restricted but not require further treatment, has the generator notified the land disposal facility as above, and certified the waste meets both treatment standards and applicable prohibitions, or one of the exemptions? 268.7(a)(2-3)	N/A		
For an on-site treatment facility, is the information contained in the notice required by a generator (except for the manifest number) on file? 265.73(b)(11)	N/A		
For an on-site land disposal facility, is the information contained in the notice required by a generator or treater (except the manifest number) on file? 265.73(b)(12)	N/A		
Recordkeeping:			
Has the treatment facility tested, noticed, and certified (if appropriate) each waste shipment? 268.7(b)(1-2)	N/A		

Note: If an off-site shipment without notification has occurred, list the accepting treatment or disposal facility for proper follow-up.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
For an off-site treatment facility, is a copy of the generator's notice on file? 265.73(b)(9)	N/A		
If a land disposal facility, have they records of each notice and certification received, and analysis of the waste to confirm compliance? 268.7(c), 265.73(b)(11)	N/A		
Surface impoundments:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility: 268.4(a)-			
(1) Treated, not just stored, the wastes in the impoundment?	N/A		
(2) Analyzed and removed all treatment residues (sludge and supernatant*) that do not meet the treatment standards annually?			
Not placed the residues in another impoundment for subsequent management?			
Specified the procedures and schedule for sampling, analysis, and removal of any residues in the waste analysis plan?			
(3) Certified that all impoundments used to treat restricted wastes meet the design requirements (265.221(a)), and the facility is in compliance with GW monitoring (265 Subpart F) requirements?			
Is evaporation not used as the principal means of treatment? 268.4(b)			

* If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed. 268.4(a)(2)